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8 Attorneys for Plaintiffs  
THOMAS WEISEL PARTNERS LLC and  
9 THOMAS WEISEL INTERNATIONAL  
PRIVATE LIMITED  
10

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION  
14

15 THOMAS WEISEL PARTNERS LLC, a  
16 Delaware limited liability company, and  
THOMAS WEISEL INTERNATIONAL  
PRIVATE LIMITED, an Indian company,  
17

18 Plaintiffs,

19 v.

20 BNP PARIBAS, a French corporation, BNP  
PARIBAS SECURITIES (ASIA) LIMITED,  
21 a Hong Kong company, and PRAVEEN  
CHAKRAVARTY, an individual,  
22

23 Defendants.  
24  
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No. C-07-6198 MHP

Action Filed: December 6, 2007

DECLARATION OF MICHAEL L.  
GALLO IN SUPPORT OF PLAINTIFFS'  
CONSOLIDATED OPPOSITION TO  
DEFENDANTS' MOTIONS TO  
DISMISS THE FIRST AMENDED  
COMPLAINT

Date: August 18, 2008  
Time: 2:00p.m.  
Place: Courtroom 15  
Judge: Hon. Marilyn Hall Patel

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27 REDACTED  
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1 I, Michael L. Gallo, declare:

2 1. I am an attorney admitted to practice before the Bar of the State of  
3 California. I am an associate with the law firm of Howard Rice Nemerovski Canady Falk &  
4 Rabkin, A Professional Corporation, counsel to Plaintiffs Thomas Weisel Partners LLC  
5 ("TWP LLC") and Thomas Weisel International Private Limited ("TWIPL") in this action. I  
6 make this Declaration upon personal knowledge and, if called upon to testify, could and  
7 would testify competently hereto.

8 2. I make this declaration in support of Plaintiffs' Consolidated Opposition To  
9 Defendants' Motions To Dismiss Plaintiff's First Amended Complaint.

10 3. Attached hereto as Exhibit A is a true and correct copy of excerpts from  
11 Thomas Weisel Partners Group, Inc.'s Form S-1 Securities Registration Statement filed on  
12 April 24, 2006. This document was collected at my direction from the Securities and  
13 Exchange Commission's website and can be located electronically at the following url:  
14 <http://www.sec.gov/Archives/edgar/data/1340354/000095013406007709/f19479sv1.htm>.

15 4. Attached hereto as Exhibit B is a true and correct copy of a BNP Paribas  
16 September 19, 2006 press release titled "BNP Paribas announces new nominations in  
17 Corporate Finance and Equity Brokerage in Asia." This document was collected at my  
18 direction from the BNP Paribas website and can be located electronically at the following  
19 url: <http://invest.bnpparibas.com/en/news/press-releases-prin.asp?Code=BDEV-6TSBP3>.

20 5. Attached hereto as Exhibit C is a true and correct copy of BNP Paribas  
21 corporate information collected at my direction from the California Business Portal website  
22 at my direction and can be located electronically at the following url:  
23 <http://kepler.sos.ca.gov/corpdata/ShowAllList?QueryCorpNumber=C0559190&printer=yes>.

24 6. Attached hereto as Exhibit D, and **filed under seal**, is a true and correct  
25 copy of Defendant BNP Paribas Securities (Asia) Limited's Supplemental Response To  
26 Plaintiffs' First Set Of Interrogatories Re: Jurisdiction/Forum Non Conveniens, dated May  
27 19, 2008.

7. Attached hereto as Exhibit E is a true and correct copy of some pages from the BNP Paribas website that describe BNP Paribas's operation. These website pages were located at my direction and can be located electronically at the following url: <http://www.banque.bnpparibas.com/en/pid496/in-brief.html?print=on>.

8. Attached hereto as Exhibit F is a true and correct copy of a page of information regarding BNP Paribas Securities Services, located on its website and collected at my direction. This document can be located electronically at the following url: <http://securities-services.bnpparibas.com/jahia/Jahia/site/bp2sportal/pid/69>.

9. Attached hereto as Exhibit G is a true and correct copy of a BNP Paribas press release dated March 13, 2007 and titled "With Geojit, BNP Paribas enters into savings products distribution in India and creates the BNP Paribas Personal Investors business line." This document was collected from the BNP Paribas website at my direction and can be located electronically at the following url: <http://invest.bnpparibas.com/en/news/press-releases-print.as?Code=LPOI-6Z9BSP>.

10. Attached hereto as Exhibit H is a true and correct copy of excerpts from the BNP Paribas 2006 Annual Report, collected from the BNP Paribas website at my direction. A link to a .pdf of the report can be located electronically at the following url: <http://www.bnpparibas.com/en/new/group.asp?Code=EJOA-738E4R&Key=BNP%20Paribas%20publishes%20its2-2006%annual%20report>.

11. Attached hereto as Exhibit I is a true and correct copy of information regarding BNP Paribas Securities, located on its website and collected at my direction. This document can be located electronically at the following url: <http://www.equities.bnpparibas.com/gb/login.asp>.

12. Attached hereto as Exhibit J are true and correct copies of (1) a BNP Paribas press release dated June 27, 2007 and titled "BNP Paribas Securities (Asia) Boosts Research Capabilities" and (2) company biographies of Jonathan Harris and Pierre Rousseau, linked to this release. These documents were collected from the BNP Paribas

1 website at my direction and can be located electronically at the following url:  
2 [http://hongkong.bnpparibas.com/en/new/news\\_print.asp?Code=CMOK-74LBAU](http://hongkong.bnpparibas.com/en/new/news_print.asp?Code=CMOK-74LBAU).

3 13. Attached hereto as Exhibit K is a true and correct copy of Thomas Weisel  
4 Partners Group, Inc.'s Form 8-K filed with the Securities Exchange Commission on  
5 December 6, 2007.

6 14. Attached hereto as Exhibit L is a true and correct copy of a BNP Paribas  
7 press release dated December 6, 2007 and titled "BNP Paribas Securities Asia Launches  
8 Onshore Research Platform in India." This document was collected at my direction from the  
9 BNP Paribas website and can be located electronically at the following url:  
10 [http://www.bnpparibas.com/en/news/group.as?Code=IAKP-79MEAK&Key=BNP%20](http://www.bnpparibas.com/en/news/group.as?Code=IAKP-79MEAK&Key=BNP%20Paribas%20)  
11 [Paribas%20](http://www.bnpparibas.com/en/news/group.as?Code=IAKP-79MEAK&Key=BNP%20Paribas%20).

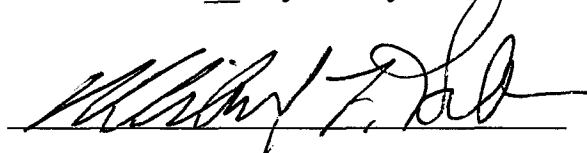
12 15. Attached hereto as Exhibit M is a true and correct copy of a "Judicial  
13 Caseload Profile Report" from the United States District Court for the Northern District of  
14 California collected from the U.S. Courts website at my direction. This document can be  
15 located electronically at the following url: <http://www.uscourts.gov/cgi-bin/cmsd2007.pl>.

16 16. Attached hereto as Exhibit N is a true and correct copy of Defendant  
17 Praveen Chakravarty's Response To Plaintiffs' First Set Of Interrogatories Regarding  
18 Jurisdiction/Forum Non Conveniens, dated May 30, 2008.

19 17. Attached hereto as Exhibit O is a true and correct copy of a July 3, 2008 e-  
20 mail from Leiv Blad to myself entitled "Discovery issue."

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22 I declare under penalty of perjury under the laws of the United States of America that  
23 the foregoing is true and correct.

24 Executed this <sup>9th</sup> day of July 2008 at San Francisco, California

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